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#### HALPERIN BATTAGLIA RAICHT, LLP

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Counsel to EMC Corporation, Macquarie Finance Equipment, LLC, RCR Enterprises, LLC and

Local Counsel to Brandenburg Industrial Service Co.

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re: Chapter 11 Case No.

GENERAL MOTORS CORP., 09-50026 (REG)

et al.

Debtors. (Jointly Administered)

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## VERIFIED STATEMENT OF HALPERIN BATTAGLIA RAICHT, LLP PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019

Halperin Battaglia Raicht, LLP ("<u>HBR</u>") hereby submits this verified statement of multiple representations pursuant to Federal Rules of Bankruptcy Procedure 2019(a) (the <u>Bankruptcy Rules</u>"), and discloses the following:

- 1. HBR is counsel to EMC Corporation, Macquarie Finance Equipment, LLC, RCR Enterprises, LLC, and local counsel to Brandenburg Industrial Service Co. (collectively, the "Entities"), each of whom has a claim against the above-captioned debtors (the "Debtors"). The full address for each of the Entities is set forth in the annexed Exhibit A.
- 2. The specific nature and amounts of the claims held by the Entities will be set forth in proofs of claims filed against the Debtors' estates. The Entities are the original holders of their respective claims. Such claims arose at the time of and in connection with their respective transactions with the Debtors.

- 3. The Entities have asked HBR to represent their respective interests in connection with the Debtors' cases.
  - 4. HBR will supplement this statement as necessary.

### **VERIFICATION**

The undersigned hereby verifies under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York June 22, 2009

HALPERIN BATTAGLIA RAICHT, LLP Counsel to EMC Corporation, Macquarie Finance Equipment, LLC, RCR Enterprises, LLC, and local counsel to Brandenburg Industrial Service Co.

By: /s/ Christopher J. Battaglia Christopher J. Battaglia 555 Madison Avenue, 9<sup>th</sup> Floor New York, New York 10022 (212) 765-9100

#### **EXHIBIT A**

## <u>Party's Name</u> <u>Party's Address</u>

Brandenburg Industrial Service Co. Anthony Guarnero

Brandenburg Industrial Service Co.

2625 S. Loomis Chicago , IL 60608

EMC Corporation *c/o* Stewart Broder, Esq.

Corporate Counsel 176 South Street

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- and -

c/o Heather Salber

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